

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOE,

Plaintiff,

v.

COLLINS MURPHY, SHARON  
HAMMONDS, BRENDA F. WATKINS,  
LIMESTONE UNIVERSITY, MG  
FREESITES, LTD., d/b/a PORNHUB.COM,  
MG FREESITES II LTD., MINDGEEK  
S.A.R.L., MINDGEEK USA, INC., MG  
BILLING LTD., and HAMMY MEDIA LTD.  
d/b/a XHAMSTER.COM, TRAFFICSTARS  
LTD., WISEBITS LTD, XHAMSTER IP  
HOLDINGS LTD, WISEBITS IP LTD,

Defendants.

CASE NO. 7:21-CV-03193-DCC

**DEFENDANT MG FREESITES'  
ANSWERS TO LOCAL RULE 26.01  
INTERROGATORIEES**

MG Freesites Ltd (“MG Freesites” or “Defendant”), a Defendant in the above captioned matter, answers interrogatories propounded by Rule 26.01, Local Civil Rules (D.S.C.), as follows:

- (A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

**ANSWER: None.**

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

**ANSWER: Plaintiff’s claims raised in the Third Amended Complaint (Dkt. # 91) should be tried by jury as seeking legal remedies for damages allegedly incurred.**

- (C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party’s stock; (2) each publicly-owned company of

which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**ANSWER: Defendant MG Freesites is a privately-owned, foreign company. The remaining inquiry contained within LR26.01 ROG#3 is therefore inapplicable and not answered.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

**ANSWER: Defendant MG Freesites does not oppose venue as the Third Amended Complaint alleges facts and circumstances purportedly arising within the Spartanburg Division of the District of South Carolina.**

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**ANSWER: Defendant MG Freesites is aware of a related case involving the same Defendants, Jane Does 1-9, v. Collins Murphy, et al., Civil Action No.: 7:20-cv-00947 DCC (“Murphy I”) currently pending in the United States District Court, in the District of South**

**Carolina, Spartanburg Division. Plaintiffs in Murphy I have filed a Motion to Consolidate Murphy I and this case (Dkt. 204 in Murphy I).**

(F) *[Defendants only.]* If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER: Defendant MG Freesites is properly identified.**

(G) *[Defendants only.]* If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**ANSWER: Defendant MG Freesites contends that other defendants in this action, including defendant Murphy, is primarily liable to Plaintiffs for the injury alleged in this lawsuit. Additionally, to the extent that Plaintiffs' allege that their injury arises from the online publication or distribution of certain videos, MG Freesites contends that third parties are responsible and primarily liable for such publication or distribution and that the videos at issue were published on websites other than MG Freesites' website. Defendant MG Freesites reserves the right to amend or supplement this answer following discovery.**

**SIGNATURE PAGE TO FOLLOW**

DATED August 23, 2022

TURNER, PADGET, GRAHAM AND LANEY, P.A.

Columbia, South Carolina

By: /s/ Mark Goddard

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